

FILED

Apr 09 - 2025

John M. Domurad, Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SALVADOR DIAZ-DIAZ,

Defendants.

) Criminal No. 8:25-CR-149 (GTS)

) **Indictment**

) Violations: 8 U.S.C. § 1324(a)(1)(A)(v)(I)
) [Conspiracy to Commit Alien
) Smuggling]

) 8 U.S.C. § 1324(a)(2)(B)
) [Alien Smuggling]

) 26 Counts

) Counties of Clinton & Franklin

) Offenses:

THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Commit Alien Smuggling]

Between on or about December 1, 2022 and on or about April 9, 2025, in Clinton and Franklin Counties in the Northern District of New York, and elsewhere, the defendants,

SALVADOR DIAZ-DIAZ,

and others, conspired to commit alien smuggling by, knowing that one or more persons were aliens, bringing and attempting to bring to the United States in any manner whatsoever such persons at a place other than a designated port of entry, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i) and (v)(I).

COUNTS 2 - 26
[Alien Smuggling]

On or about the following dates, in the following counties in the Northern District of New York, the defendants,

SALVADOR DIAZ-DIAZ,

, knowing and in reckless disregard of the fact that aliens believed to have the following initials had not received prior official authorization to come to, enter, and reside in the United States, brought to the United States in any manner whatsoever, such aliens:

| Count | Dates | County | Alien's Initials |
|--------------|----------------------------------|---------------|-------------------------|
| 2 | August 1 through August 31, 2022 | Clinton | C.R.-M. |
| 3 | December 31, 2022 | Clinton | G.R.-R. |
| 4 | March 1 through March 31, 2023 | Clinton | E.J.-V. |
| 5 | April 30, 2023 | Franklin | G.T.-P. |
| 6 | April 30, 2023 | Franklin | C.M.-S. |
| 7 | April 30, 2023 | Franklin | V.A.-H. |
| 8 | April 30, 2023 | Franklin | M.G.-H. |
| 9 | April 30, 2023 | Franklin | J.G.-L. |
| 10 | April 30, 2023 | Franklin | A.G.-S. |
| 11 | April 30, 2023 | Franklin | M.H.-L. |
| 12 | May 28, 2023 | Clinton | R.B.-A. |
| 13 | May 28, 2023 | Clinton | A.J.-J. |
| 14 | May 28, 2023 | Clinton | J.M.-T. |
| 15 | May 28, 2023 | Clinton | G.V.-A. |
| 16 | July 14, 2023 | Clinton | C.R.-A. |
| 17 | July 14, 2023 | Clinton | A.N.-C. |
| 18 | July 24, 2023 | Clinton | D.P.-A. |

| | | | |
|----|-----------------|---------|---------|
| 19 | July 24, 2023 | Clinton | S.R.-M. |
| 20 | July 24, 2023 | Clinton | Y.P.-H. |
| 21 | August 12, 2023 | Clinton | D.B.-G. |
| 22 | August 12, 2023 | Clinton | D.C.-C. |
| 23 | August 12, 2023 | Clinton | L.C.-C. |
| 24 | August 12, 2023 | Clinton | A.M.-V. |
| 25 | August 12, 2023 | Clinton | L.Q.-L. |
| 26 | August 12, 2023 | Clinton | J.R.-M. |

all in violation of Title 8, United States Code, Section 1324(a)(2). Counts 2 through 26 were done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Counts 2 and 3 were the defendants' first and second violations of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B). Counts 4 through 26 were the defendants' third through twenty-fifth violations of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

Dated: April 9, 2025

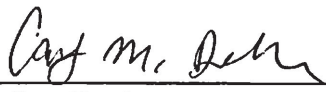
A TRUE BILL,

*name redacted

Grand Jury Foreperson

JOHN A. SARCONI III
United States Attorney


By:



Carling Dunham
Assistant United States Attorney
Bar Roll No. 703858

MATTHEW R. GALEOTTI
Head of the Justice Department's
Criminal Division

By:



Jenna Reed
Trial Attorney
Human Rights and Special Prosecutions
PA Bar Roll No. 703858